

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN**

INNOVATIVE ACCOUNTING  
SOLUTIONS, INC., a Michigan  
Corporation, individually and as the  
representative of a class of similarly-  
situated persons,

Plaintiff,

v.

CREDIT PROCESS ADVISORS, INC.,  
and ACCOUNT ADJUSTMENT  
BUREAU, INC.,

Defendants.

Case No. 1:15-cv-00793-PLM-PJG  
Hon. Judge Paul L. Maloney  
Magistrate Phillip J. Green

**STIPULATION REGARDING DEPOSITION OF DOROTHY SUE MERRYMAN**

On June 17, 2021, the Court entered an Order granting Defendant Account Adjustment Bureau, Inc. (“AAB’s”) request to re-open discovery for the limited purpose of deposing non-party Declarant, Dorothy Sue Merryman (hereinafter, the “Deponent”), on or before July 17, 2021 [ECF #114].

AAB’s counsel has conferred with the Deponent, as well as Plaintiff’s counsel, to obtain mutually agreeable dates to conduct the deposition, and the parties have agreed to conduct the deposition (via Zoom) on the agreed upon date of August 3, 2021.

Therefore, AAB requests, and Plaintiff does not oppose, entry of an order allowing the deposition to proceed on August 3, 2021.

AAB shall file its response to the motion to amend class definition within 14 days of completion of the deposition, as previously ordered by the Court.

/s/ David M. Oppenheim (w/consent 7-16-2021)

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